

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

GWACS ARMORY, LLC)	
)	
Plaintiff,)	
)	
v.)	
)	Case No.: 20-cv-341-JDR-SH
KE ARMS, LLC,)	BASE FILE
)	
)	Consolidated with:
)	Case No. 21-cv-107-JDR-SH
Defendants.)	Trial Docket: 2/10/2025

DEFENDANT’S PROPOSED VOIR DIRE

Defendant/Counter-Plaintiff, KE Arms, LLC (“KEA”), by and through their undersigned attorneys of record, Marquis Aurbach, requests that this Court inquire the following the matters with each prospective juror during this jury selection process:

GENERAL PERSONAL BACKGROUND

To the extent jury questionnaire forms or jury list do not reveal the information below, please inquire into the following matters:

Each juror’s age;

Each juror’s marital status;

Each juror’s family status - number of children and their ages;

Each juror’s educational background;

Whether any of the jurors or any members of their immediate family have any legal education or training;

Each juror's current occupation or the former occupation if they are presently retired or unemployed; and

The current occupation or the former occupation, if retired, or unemployed, of the spouses and immediate family members of the jurors.

KNOWLEDGE OF PARTICIPANTS AND RELATED ISSUES

1. Has any juror, their spouse or close relative known or ever had any contact with Russel Phagan, Mike Kenney, Jud Gudgel, Michel "Shel" Jones, Scott Merrill, Russell Anderson, Reed Oppenheimer or Clayton Woodrum or any of their respective family? If so, please explain.

2. Has any juror, their spouse or close relative ever been employed by or had any contact with GWACS Armory, GWACS Defense or the Reed Jules Oppenheimer Foundation? If so, please explain.

3. Has any juror, their spouse or close relative ever been employed by or had any contact with any of the lawyers or law firms in this case? If so, please explain.

4. Have any of you or any member of your family or any persons close to you, to your knowledge, ever sued anyone, presented a charge or claim against anyone, arising out of an alleged breach of contract or alleged misappropriation of trade secret? If so, what was the outcome, and did the matter terminate satisfactorily as far as you were concerned? Discuss all pertinent details.

5. Has anyone ever sued you, or presented a charge or claim against you, or to your knowledge against any member of your family or any person close to you, arising out of an alleged breach of contract or alleged misappropriation of trade secret? If so,

what was the outcome, and did the matter terminate satisfactorily as far as you were concern?

6. Do any of you have any feelings for or against firearms or companies in the firearm industry?

7. Do any of you have any feelings for or against the sale of AR-15 style rifles?

8. Are any of you or any member of your family or any person close to you to your knowledge presently involved in a lawsuit of any kind?

9. Have any of you or any member of your family or person close to you had any special firearms training or expertise?

10. Have you ever testified in a lawsuit, either as a fact witness or an expert witness? If so, please explain.

11. Would you be able to set aside your experiences as a party or witness and decide this case solely on the evidence you hear in court?

12. Has any juror served on a jury before? If so, please explain.

Dated: February 4, 2025.

Respectfully submitted,

**HALL, ESTILL, HARDWICK,
GABLE, GOLDEN & NELSON, P.C.**

/s/ Robert P. Fitz-Patrick

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-AND-

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of February, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the Following ECF registrants:

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/s/ C. Hatfield